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13 **UNITED STATES BANKRUPTCY COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN FRANCISCO DIVISION**

16 **In re:**

17 **PG&E CORPORATION**

18 **-and-**

19 **PACIFIC GAS AND ELECTRIC
COMPANY,**

20 **Debtors**

21 Affects PG&E Corporation
22 Affects Pacific Gas and Electric Company
23 Affects both Debtors

24
25 *All papers shall be filed in the Lead Case,
26 No. 19-30088 (DM)

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

27 **DECLARATION OF KODY KLEBER IN
SUPPORT OF MOTION OF THE
OFFICIAL COMMITTEE OF TORT
CLAIMANTS TO COMPEL
PRODUCTION OF THIRD-PARTY
CONTRACTOR DOCUMENTS**

28 Date: August 9, 2019
Time: 11:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 KODY D. L. KLEBER, under penalty of perjury, declares:

2 1. I am a partner at Baker & Hostetler LLP, counsel to the Official Committee of Tort
3 Claimants (the “**TCC**”) of PG&E Corporation and Pacific Gas and Electric Company (the
4 “**Debtors**”) in these chapter 11 cases.

5 2. I submit this Declaration in support of the Motion of the Official Committee of Tort
6 Claimants to Compel Production of Third Party Contractor Documents (“**Motion**”).

7 3. Unless otherwise stated in this Declaration, I have personal knowledge of the facts
8 set forth herein.

9 4. Attached hereto as **EXHIBIT A** is a true and correct copy of Ex Parte Application
10 of the Official Committee of Tort Claimant’s Pursuant to Federal Rule of Bankruptcy Procedure
11 2004 for Orders Authorizing Production of Documents.

12 5. Attached hereto as **EXHIBIT B** is a true and correct copy of the letter, dated
13 June 25, 2019, from counsel for the TCC to counsel for Debtors regarding deficiencies in discovery
14 responses.

15 6. Attached hereto as **EXHIBIT C** is a true and correct copy of the letter, dated
16 June 29, 2019, from counsel for Debtors to counsel for the TCC responding to counsel for the
17 TCC’s June 25, 2019 letter.

18 7. Attached hereto as **EXHIBIT D** is a true and correct copy of Exhibit 13 of
19 Document 1036, publicly available on the criminal docket in Case No. 3:14-cr-00178-WHA.

20 8. Attached hereto as **EXHIBIT E** is a true and correct copy of Judge William Alsup’s
21 Order, dated November 27, 2018, directing Debtors to provide an accurate and complete statement
22 of the role, if any, of PG&E in causing and reporting the Camp Fire in Butte County.

23 9. Attached hereto as **EXHIBIT F** is a true and correct copy of Debtors Response,
24 filed December 31, 2018, to Judge Alsup’s November 27, 2018 Order.

25 10. Attached hereto as **EXHIBIT G** is a true and correct copy of Wall Street Journal
26 Investigative Report, “PG&E Knew for Years Its Lines Could Spark Wildfires, and Didn’t Fix
27 Them,” published July 10, 2019.

1 11. Attached hereto as **EXHIBIT H** is a true and correct copy of Judge William Alsup's
2 Order, dated July 10, 2019, ordering Debtors to file a public statement responding to the Wall Street
3 Journal Investigative Report.

4 12. Attached hereto as **EXHIBIT I** is a true and correct copy of email correspondence,
5 dated July 2019, to and from counsel for TCC and counsel for Debtors regarding counsel for TCC's
6 request for immediate production of documents used in the factual report submitted to Judge Alsup
7 on December 31, 2018.

8
9 *Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States
10 of America that the foregoing is true and correct to the best of my knowledge and belief.*

11
12 Executed on July 25, 2019


By: Kody D. L. Kleber